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**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

MINMETALS, INC.,

Plaintiff,

vs.

DRAGON BOOM, LTD., a British Virgin Islands limited company; B&H AMERICAN, INC., a New Jersey Corporation; UNITED RESOURCES USA, INC., a New Jersey Corporation; GARY INTERNATIONAL HOLDINGS, LTD., a Hong Kong limited company; HANGZHOU BAOHANG INDUSTRIAL INVESTMENT GROUP, LTD., a People's Republic of China limited company; DANG MIN (a.k.a. MIN DANG), an individual; LI ZHENG, an individual; XIYOU XU (a.k.a. GRACE XU), an individual; ABC CORPORATIONS 1-10, and JOHN DOES 1-10,

Defendants.

Case No.: 2:13-cv-03834
(KSH-CLW)

**PLAINTIFF MINMETALS'
NOTICE OF MOTION TO
COMPEL THE PRODUCTION
OF DISCOVERY FROM
DEFENDANT
DRAGON BOOM, LTD.**

Return Date: February 17, 2015

PLEASE TAKE NOTICE that on February 17, 2015, at 9:00 a.m., or as soon thereafter as counsel may be heard, Plaintiff Minmetals, Inc. (“Minmetals”), by and through its counsel, the Mueller Law Group, shall move before the Honorable Cathy L. Waldor, U.S.M.J., United States District Court for the District of New Jersey, Courtroom 4C, located in the Martin Luther King Building & United States Courthouse, 50 Walnut Street, Newark, New Jersey 07101, for an Order compelling defendant Dragon Boom, Ltd. (“Dragon Boom”) to serve complete responses to Plaintiff’s Interrogatories Addressed to Dragon Boom, dated May 15, 2014, and to produce documents for discovery and inspection pursuant to Plaintiff’s First Set of Stage 1 Requests for the Production of Documents, dated May 15, 2014, and further requiring Dragon Boom to pay costs and attorneys’ fees incurred by Minmetals in bringing this motion as sanctions for noncompliance, and for such other and further relief as the court may deem necessary and proper.

PLEASE TAKE FURTHER NOTICE that, in support of its Motion, Plaintiff will rely on the accompanying Memorandum of Law and Declaration and Certification of Douglas P. Baumstein, dated January 15, 2015, with Exhibits filed herewith.

PLEASE TAKE FURTHER NOTICE that oral argument is not requested unless the matter is contested.

PLEASE TAKE FURTHER NOTICE that a proposed form of Order is submitted herewith.

Dated: January 15, 2015
New York, New York

Respectfully submitted,

/s/ Gregory K. Mueller

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